

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO,  
EASTERN DIVISION**

**DARRYL D. MOORE, SR.**

Plaintiff,

v.

**DAVYON AUGUSTUS**

Defendant.

**CASE NO.: 1:24-CV-00923**

**JUDGE: RUIZ**

**FILED**

**JUL 08 2024**

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

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**COMPLAINT FOR DEFAMATION AND TELECOMMUNICATIONS HARASSMENT**

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NOW Comes, Plaintiff, Darryl D. Moore, pro se, before this honorable court. This is a diversity action brought under the laws of the State of Ohio, seeking compensatory and punitive damages, a declaratory judgment, permanent injunctive relief, court fees and costs arising out of a persistent, deliberate, and unprovoked campaign of online defamation and harassment against the Plaintiff.

I am a professional actor and filmmaker. As a hobby and additional source of income, I became a social media content creator. My weekly YouTube shows reach approximately 10,000 subscribers. Since the Fall of 2019, I have been the subject of an obsessive, vitriolic and threatening series of YouTube videos posted by the Defendant, Davyon Augustus, who is a stranger to me.

In rambling videos and live video streams that sometimes exceed two hours in length, Augustus has repeatedly defamed me, falsely accused me of plotting to shoot his friend/lover/employer Larry Reid in the chest. Augustus claimed that I threatened to track Reid down at his Atlanta home and told his vast audience that I was violent and mentally ill. Augustus

urged his fanbase to report my videos and channel to YouTube as well as call my places of employment and the Euclid Police to alert them of “violent behavior”. The videos posted by Augustus have been viewed extensively, some more than 25,000 times, and his defamatory statements have, among other things, caused me to lose subscribers and revenue. Furthermore, Augustus’ constant unprovoked attacks has caused great emotional stress leading to depression and physical ailments.

### **JURISDICTION**

This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332 (a)(1) in that the amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), and the action is between citizens of different states, in that the Plaintiff resides solely in the State of Ohio, and the Defendant resides in the State of South Carolina.

Venue in this Court is proper pursuant to 29 U.S.C. § 1391 (b)(1) in that the Plaintiff resides within this judicial district, and in the Eastern Division, pursuant to L.R. Civ. 3.8 (a) in that the Plaintiff resides within Cuyahoga County, Ohio.

### **STATEMENT OF FACTS**

Davyon Augustus has a Civil Stalking and Protection Order (**see attachment**) against him for stalking and harassment (**CV-22-964092**). The CSPO was granted due to Augustus constant threats and harassment via social media and his phone calls to my former place of employment and personal cellphone. Even though I was granted the CSPO, Augustus continued to harass me nonstop on social media. I was compelled to file a civil lawsuit against him. The CSPO is valid until July 2025.

The CSPO forbids the Defendant from making any content about me. Augustus refuses to comply with the order of the court. He has placed pictures of my home on the internet, photos of

family members, contacted my former place of employment which led to my termination. Augustus stated on his YouTube channel that he prayed for my father to die. Augustus and his mentee Brian Hugh Henry II called my mother who was battling dementia and recorded her against her will and without her knowledge live on YouTube.

Several police reports were filed with the Euclid Police Department and East Cleveland Police Department because of the constant harassment by the Defendant. He has even threatened my life on social media with what I thought at the time was an AR-15 style weapon. It was discovered later to actually be an air-rifle.

Augustus uploaded an altered video on YouTube dated March 18, 2020, titled "Proof that Darryl Moore Threatened Larry Reid Live" that purported that I wanted to put two bullets in the chest of Larry Reid ([https://www.youtube.com/watch?v=k9V\\_SmZWTS&t=49s](https://www.youtube.com/watch?v=k9V_SmZWTS&t=49s)). Augustus had Andrea Garrison call me while he recorded the conversation. In that phone conversation, Garrison asked me questions that Augustus cut and spliced to make it appear that I plotted to harm his lover. He even had another person's voice spliced pretending to be me in the bogus video that he circulated on YouTube at the behest of his lover Larry Reid who used the video as evidence in a civil lawsuit against me. I filed a police report and submitted it to YouTube requesting the video be removed after I showed the original un-edited version (<https://youtu.be/QnBstjEAsXY>). The video was removed by YouTube, but Augustus put it back up. This was one of the primary reasons that I filed a report with the FBI and Euclid Police Department against him. This led to me being granted a CSPO against him. He is a threat to my safety and my family.

Since the CSPO has been granted, the Defendant has made countless videos. Once he realized he was being sued, he removed some and placed them in his private group on the

Patreon app. On that platform, his subscribers are charged a monthly fee to view content. Those videos are either on YouTube or Patreon. Here are the links to some of the videos (see attachments for screenshots of others that have been removed):

- <https://www.youtube.com/watch?v=c7amNbUo0vA>
- <https://www.youtube.com/watch?v=-Gul.2raxUHo&t=4949s>
- <https://www.youtube.com/watch?v=dckL.CvCFtgs&t=395s>
- <https://www.youtube.com/watch?v=P7akSXpm0u4&t=5784s>
- <https://www.youtube.com/watch?v=en6NTgTwrp8>
- <https://www.youtube.com/watch?v=XluBrYPr2s&t=83s>
- <https://www.youtube.com/watch?v=drjYKJWtYGk&t=143s>
- <https://www.youtube.com/watch?v=DlnaaZ6HFNU>
- <https://www.youtube.com/watch?v=IBp9lOaD9to>
- [https://drive.google.com/drive/folders/1pJnUDpl6zon81OK5fOxi\\_1gcF4A0FNEf?usp=drive\\_link](https://drive.google.com/drive/folders/1pJnUDpl6zon81OK5fOxi_1gcF4A0FNEf?usp=drive_link)

### **LEGAL BASIS**

Ohio Revised Code Section 2739.01 Libel and slander. Effective: October 1, 1953, Legislation: House Bill 1 - 100th General Assembly In an action for libel or slander, it is sufficient to state, generally, that the defamatory matter was published or spoken of by the plaintiff. If the allegation is denied, the plaintiff must prove the facts, showing that the defamatory matter was published or spoken of him. In such action it is not necessary to set out any obscene word, but it is sufficient to state its import.

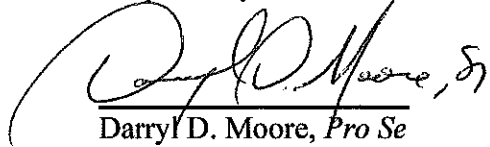
**RELIEF SOUGHT**

I am petitioning the court for an injunction banning the Defendant from social media for three years and the permanent removal of all social media content about me.

I seek compensatory damages for the loss of employment with the City of East Cleveland. Furthermore, I seek punitive damages for pain and suffering, mental anguish, slander, and defamation of my character. The amount is greater than Seventy-five thousand dollars.

For such other relief, be it legal or equitable, as the Court in the sound exercise of its discretion deems just.

Respectfully submitted,

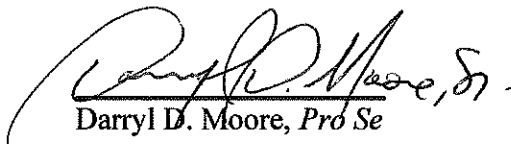


Darryl D. Moore, *Pro Se*

**CONCLUSION**

Based upon the facts set forth above and for the reasons thereby outlined above, the Plaintiff's *Motion* should be granted.

Respectfully submitted,


  
Darryl D. Moore, *Pro Se*

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing *Complaint for Defamation and Telecommunication Harassment against Davyon Augustus* was made via USPS mail with sufficient postage attached this 1 day of July 2024.

Office of the Clerk  
United States District Court  
Northern District of Ohio  
Carl B. Stokes United States Court House  
801 West Superior Avenue  
Cleveland, OH 44113-1830

Davyon Augustus  
5322 Ridgeway Street  
Columbia, SC 29203

  
Darryl D. Moore, Pro Se